

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY, and
ACE AMERICAN INSURANCE COMPANY

Defendants.

Case No. 16-CV-1054(WMW/DTS)

**SECOND SUPPLEMENTAL
EXPERT REPORT
OF NEIL J. ZOLTOWSKI
WITH RESPECT TO DAMAGES**

Respectfully submitted this 13th day of May, 2021



Neil J. Zoltowski

CONFIDENTIAL – ATTORNEYS’ EYES ONLY

Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company

SECOND SUPPLEMENTAL SCHEDULE 8.0: Summary of Defendants' Domestic Gross Written Premium

Domestic Applications	March 31, 2016 to May 2020 (a)				
	Defendants Only	Subsidiaries of Defendants	Pooling Entities (Not Subsidiaries) of Defendants	Defendants, Subsidiaries and Pooling Entities (b)	
<i>Undisputed Applications</i>					
Commercial Underwriting Workstation (CUW)	\$ 7,656,976,368	\$ 3,663,148,142	\$ 1,427,268,700	\$ 12,747,393,210	
CSI eXPRESS (c)	4,783,945,129	132,704,843	94,672,823	5,011,322,794	
Premium Booking	1,750,877,402	-	-	1,750,877,402	
Texas Accident Prevention System (TAPS)	462,805,017	270,951,408	110,550,113	844,306,538	
Individual Rate Modification Application (IRMA)	223,406,656	69,554,858	7,355,485	300,316,999	
Decision Point	18,101,109	1,117,772	34,636	19,253,516	
<i>Disputed Application</i>					
Cornerstone	\$ 518,138,795	\$ (3,510,098)	\$ 14,281,786	\$ 528,910,484	
Undisputed Total	\$ 14,896,111,681	\$ 4,137,477,023	\$ 1,639,881,756	\$ 20,673,470,459	
Disputed Total	518,138,795	(3,510,098)	14,281,786	528,910,484	
TOTAL	\$ 15,414,250,476	\$ 4,133,966,925	\$ 1,654,163,542	\$ 21,202,380,943	

Note/Source(s):

- (a) See **Second Supplemental Schedules 10.3-10.6 and 12.0**. Defendants identified in its interrogatory responses that the Blaze Advisor component was removed from the applications used in the United States by May 2020. (Defendants' Ninth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated September 24, 2020.)
- (b) This is equaled to the sum of (i) Defendants Only; (ii) Subsidiaries of Defendants; and (iii) Pooling Entities of Defendants.
- (c) I understand the gross written premium reported for CSI eXPRESS includes premium related to the Automated Renewals Process and Profitability Indicator applications. Further, CSI eXPRESS, Automated Renewals Process and Profitability Indicator are all used in connection with the same gross written premium policies. (Harkin Deposition at 72-74; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019 at 3-5, 11-13; Defendants' Ninth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated September 24, 2019.)

Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company

SECOND SUPPLEMENTAL SCHEDULE 9.0B: Summary of Gross Written Premium – Accused Infringement Supporting Sale of Insurance in Foreign Country

		<i>March 31, 2016 to September 30, 2019 (a)</i>			
Foreign Applications	Region	Defendants Only	Subsidiaries of Defendants	Pooling Entities (Not Subsidiaries) of Defendants	Defendants, Subsidiaries and Pooling Entities (b)
<i><u>Undisputed Applications</u></i>					
Evolution (c)	Canada	\$ -	\$ 154,380,023	\$ -	\$ 154,380,023

Note/Source(s):

- (a) See **Second Supplemental Schedules 11.3B and 12.0**. Defendants identified in its interrogatory responses that the Blaze Advisor component was removed from the Evolution application by October 2019. (Defendants' Seventh Supplemental Answer to Plaintiff's Interrogatory No. 19, dated September 24, 2020.)
- (b) This is equaled to the sum of (i) Defendants Only; (ii) Subsidiaries of Defendants; and (iii) Pooling Entities of Defendants.
- (c) I understand the Evolution (Canada) and Broker Site (Canada) applications share the same underlying database and therefore report the same gross written premium. (Harkin Deposition at 206-209.) Additionally, I understand Chubb Insurance Company of Canada was no longer a subsidiary of Federal by September 30, 2016. Accordingly, 1/2 of the gross written premium reported for year 2016 were included in this analysis. (Taylor Deposition at 85; FED006483-484; Pandey Deposition at Exhibit 527.)